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August 18, 1995

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William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

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AUG 18 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

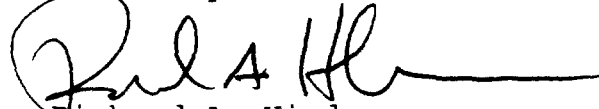
Re: Ex Parte Submission in PR Docket 89-553, GN Docket 93-252 and PP Docket 93-253

Dear Mr. Caton:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, 47 C.F.R. § 1.1206(a)(2), Geotek Communications, Inc. ("Geotek"), by its attorneys, hereby submits an original and two copies of the attached letter from John Egidio of Geotek to Amy Zoslov as a follow-up to a meeting on August 16, 1995 with the FCC's Wireless Bureau. Geotek filed an Ex Parte letter concerning the meeting on August 17, 1995.

If you have any questions regarding this matter, please contact the undersigned.

Sincerely,



Richard A. Hindman
Counsel for Geotek
Communications, Inc.

Attachment
cc: Amy Zoslov



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AUG 18 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

August 17, 1995

Ms. Amy Zoslov
Federal Communications Commission
Wireless Bureau
2025 M Street NW
Room 5322
Washington D.C. 20554

Re: Ex Parte Filing
PR Docket No. 89-553
GN Document 93-252
900 MHz SMR Auctions

Dear Ms Zoslov,

As we discussed in our meeting yesterday, Geotek Communications believes that a bidding increment of \$.02 per megahertz pop is excessive when compared to the cost of DFA licenses in the past. Based upon a 5% incremental equivalent, the value of the frequency to be auctioned would have to equal \$.40 per megahertz pop. In light of the fact that the DFA is indeed the population and business heart of the MTA, the value paid for the DFA should be a guide to the value of the MTA. To this end, I have analyzed 107 of Geotek's 900Mhz acquisitions. The cumulative price paid for these 1070 channels was \$.1176 per pop, which translates to \$.03 per megahertz pop. Using the 5% equivalency, the incremental bid should actually be \$.0015 per MHZ pop.

Geotek proposes a figure that is more equitable to all bidders of \$.0025 per megahertz pop. Geotek also believes that the fairness of this number, given the facts upon which it is based, is such that the reduced incremental bid amount should be used to determine the upfront deposit amount as well. This would both provide consistency and ensure that the deposit amount is in line with the minimum bid acceptable for all rounds after the first as it was in the other auctions. To assist you in your evaluation, I have attached a summary of the incremental bid amounts by MTA for incremental bids of \$.0025, \$.0050 and \$.02. Per megahertz pop.

Geotek appreciates the FCC's evaluation of its recommendation and is hopeful that this information convinces the FCC staff that equity can best be served with deposits and bid increments of \$.0025 per megahertz pop.

Very truly yours

A handwritten signature in black ink, appearing to read "John Egidio", written over a circular stamp or seal.

John Egidio
Senior Vice President Operations

CC: Gregory Rosston - Auctions Division
Dan Phythyon - Wireless Division

| MTA | Pop | MHz/POP (.25 * .62) | MHz/POP (.25 * .666) | MHz/POP (.25 * .0025) |
|------------------------|-------------|---------------------|----------------------|-----------------------|
| New York City/Hartford | 26,410,597 | \$132,053 | \$33,013 | \$16,507 |
| Los Angeles/San Diego | 19,146,232 | \$86,726 | \$23,932 | \$11,966 |
| Chicago | 12,069,700 | \$60,349 | \$15,087 | \$7,544 |
| San Francisco/Oakland | 11,891,177 | \$59,456 | \$14,864 | \$7,432 |
| Detroit | 10,001,009 | \$50,005 | \$12,501 | \$6,251 |
| Charlotte/Greensboro | 9,752,317 | \$48,762 | \$12,190 | \$6,095 |
| Dallas/Ft. Worth | 9,694,157 | \$48,471 | \$12,118 | \$6,059 |
| Boston/Providence | 9,452,712 | \$47,264 | \$11,816 | \$5,908 |
| Philadelphia | 8,927,748 | \$44,639 | \$11,160 | \$5,580 |
| W.D.C./Baltimore | 7,777,875 | \$38,889 | \$9,722 | \$4,861 |
| Atlanta | 6,942,084 | \$34,710 | \$8,678 | \$4,339 |
| Minneapolis/St. Paul | 5,966,039 | \$29,930 | \$7,483 | \$3,741 |
| Tampa/Orlando | 5,417,788 | \$27,089 | \$6,772 | \$3,386 |
| Houston | 5,190,849 | \$25,954 | \$6,489 | \$3,244 |
| Miami/Ft. Lauderdale | 5,136,581 | \$25,683 | \$6,421 | \$3,210 |
| Cleveland | 4,945,749 | \$24,729 | \$6,182 | \$3,091 |
| New Orleans/B. Rouge | 4,925,289 | \$24,626 | \$6,157 | \$3,078 |
| Cincinnati/Dayton | 4,716,885 | \$23,583 | \$5,896 | \$2,948 |
| St. Louis | 4,683,926 | \$23,320 | \$5,830 | \$2,915 |
| Milwaukee | 4,541,432 | \$22,707 | \$5,677 | \$2,838 |
| Pittsburgh | 4,102,766 | \$20,514 | \$5,128 | \$2,564 |
| Denver | 3,880,637 | \$19,403 | \$4,851 | \$2,425 |
| Richmond/Norfolk | 3,848,210 | \$19,231 | \$4,808 | \$2,404 |
| Seattle | 3,827,175 | \$19,136 | \$4,784 | \$2,392 |
| Puerto Rico | 3,623,846 | \$18,119 | \$4,530 | \$2,265 |
| Phoenix | 3,510,140 | \$17,551 | \$4,388 | \$2,194 |
| Memphis/Jackson | 3,466,226 | \$17,326 | \$4,332 | \$2,166 |
| Birmingham | 3,244,076 | \$16,220 | \$4,055 | \$2,028 |
| Portland | 3,059,948 | \$15,300 | \$3,825 | \$1,912 |
| Indianapolis | 3,017,475 | \$15,087 | \$3,772 | \$1,886 |
| Des Moines | 3,008,139 | \$15,031 | \$3,758 | \$1,879 |
| San Antonio | 2,968,524 | \$14,933 | \$3,733 | \$1,867 |
| Kansas City | 2,913,304 | \$14,567 | \$3,642 | \$1,821 |
| Buffalo/Rochester | 2,777,046 | \$13,885 | \$3,471 | \$1,736 |
| Salt Lake City | 2,573,372 | \$12,867 | \$3,217 | \$1,608 |
| Jacksonville | 2,274,933 | \$11,375 | \$2,844 | \$1,422 |
| Columbus | 2,145,561 | \$10,728 | \$2,682 | \$1,341 |
| El Paso/Albuquerque | 2,113,890 | \$10,569 | \$2,642 | \$1,321 |
| Little Rock | 2,051,867 | \$10,258 | \$2,565 | \$1,282 |
| Oklahoma City | 1,877,478 | \$9,387 | \$2,347 | \$1,173 |
| Spokane/Billings | 1,863,335 | \$9,317 | \$2,329 | \$1,165 |
| Nashville | 1,767,391 | \$8,837 | \$2,209 | \$1,105 |
| Knoxville | 1,721,911 | \$8,610 | \$2,152 | \$1,076 |
| Omaha | 1,658,273 | \$8,296 | \$2,074 | \$1,037 |
| Wichita | 1,124,174 | \$5,621 | \$1,405 | \$703 |
| Honolulu | 1,108,229 | \$5,541 | \$1,385 | \$693 |
| Tulsa | 1,088,386 | \$5,482 | \$1,370 | \$685 |
| Alaska | 550,043 | \$2,750 | \$688 | \$344 |
| Guam | 176,000 | \$880 | \$220 | \$110 |
| American Samoa | 47,000 | \$235 | \$59 | \$29 |
| TOTAL | 248,953,071 | \$1,245,000 | \$311,191 | \$155,596 |
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| August 17 1995 | | | | |